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June 2, 2015

VIA ELECTRONIC MAIL; WITH HARD COPY TO FOLLOW BY U.S. MAIL

Mr. Guy Donaldson
Section Chief
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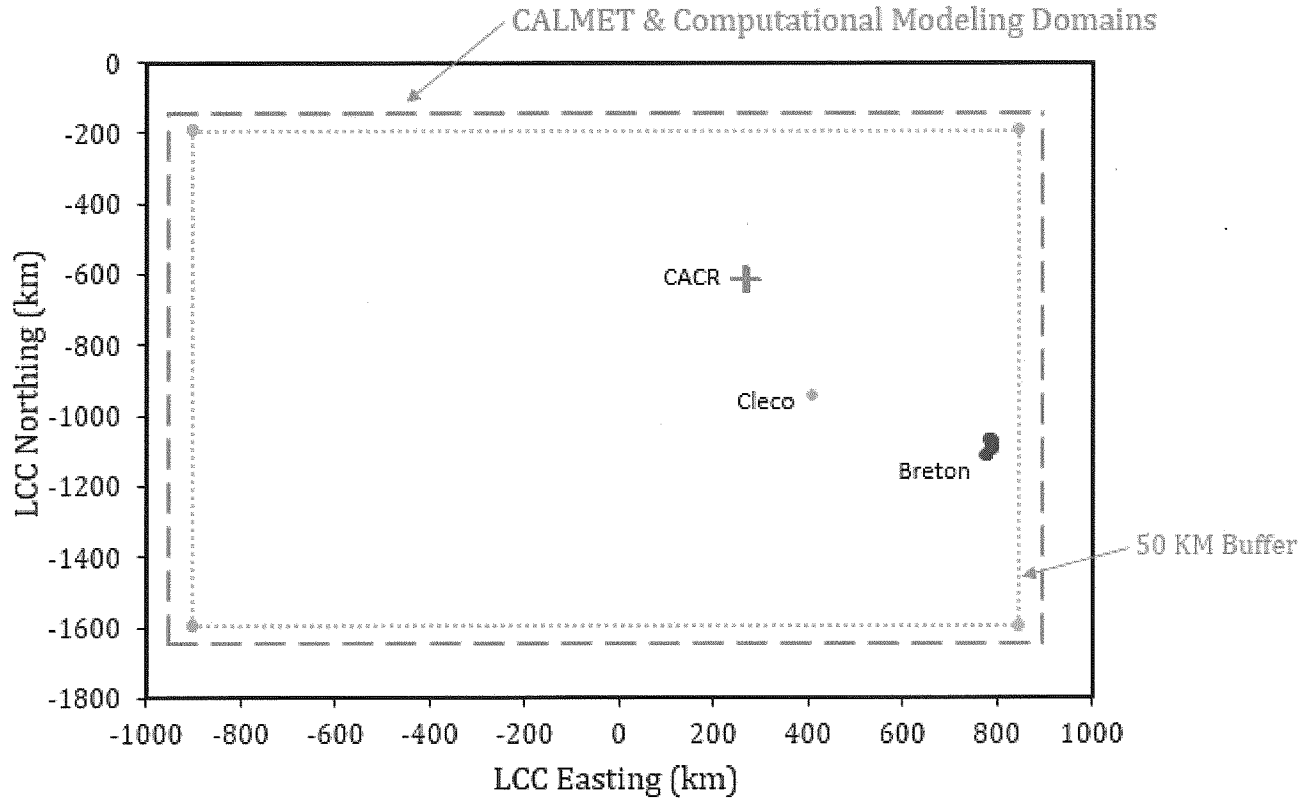
Dear Mr. Donaldson:

Re: Cleco's Questions/Comments Regarding Information Received in Recent Conference Call and Letter

Cleco has several responses/questions related to the May 19, 2015 letter from Wren Stenger (the letter) and the May 18, 2015 stakeholders' conference call (the call) that we are hoping to clear up before committing additional resources to the ongoing BART work. Thank you for your prompt responses.

1. The letter mentions Rodemacher Power Station/Brame Energy and Teche Power Station. We request that EPA reconsider their inclusion of Teche Power Station. Late last year, Ms. Venetta Hayes at LDEQ informed us that Teche Power Station would not need to undergo modeling to show insignificant visibility impacts as its baseline emissions ($\text{PM} + \text{SO}_2 + \text{NO}_x$) divided by the distance to Breton was less than 0.0898 (the ratio established by LDEQ's modeling of Big Cajun II).
2. It should also be pointed out that the baseline emission rates (specifically the maximum-day tons/day for SO_2 and NO_x) in the Louisiana SIP appear to have been overstated for Teche III. The maximum daily rates listed in the SIP were 11.27 tons/day for NO_x and 7.44 tons/day for SO_2 . These values were submitted by Cleco to LDEQ in a 2006 survey. A review of data for Teche III from CAMD reveals the highest daily emission rates in the 2001-2003 time period were actually 10.745 tons/day for NO_x and 6.836 tons/day for SO_2 which suggests the 2006 data submittal by Cleco was in error. When the emissions to distance ratio (244.5 Km distance from Teche to Breton Sound) is calculated, using these two rates from CAMD and the PM rate listed in the SIP, 1.73 tons/day, the resulting emissions/distance ratio is found to be 0.0789 which is below the 0.0898 ratio/significant impact trigger established by LDEQ. This further confirms that Teche III does not have a significant impact based upon the evaluation system established in the LDEQ SIP.
3. We plan to utilize the refined meteorological dataset that was used in the recent Arkansas BART work and that has been fully vetted by EPA. A plot showing this dataset's domain, a

standard 50-km buffer, the two Class I areas, and Cleco's site is provided below. We request EPA's approval to use this dataset.



4. Because we have decided to use refined met. data for the screening modeling, we request agreement to forego any additional work on what the letter refers to as *initial* screening modeling. This will allow us to focus all efforts on completing the *refined* screening modeling and report. As a result, it is expected that such work can be completed prior to the July 31, 2015 deadline.
5. We are concerned about the change in deadline – from December 31 to October 31, 2015 – for the five factor analysis (if applicable). Significant resources have been expended over the last two months with the goal of meeting the original deadline. A significant amount of those resources have to now be reinvested (certain tasks have to be restarted) because of some of the information gained recently during the call and in the letter. In fact, the initial screening modeling that was due last month would have to be redone, if EPA doesn't agree to forego that step (see #4, above), because it does not conform to the instructions of the letter in at least one area (e.g., CALPUFF version).
6. NO_x and SO₂ controls have been installed on Rodemacher Power Station/Brame Energy Center since the 2001-2003 time period. In the most recent call, you mentioned that controls installed since the baseline period can be considered in the five factor analysis. Presumably this would be done by establishing a base case emissions profile from which additional controls would be evaluated. Our question is: what protocol should be followed to establish the base case emissions profile? In the case of the SO₂ control at Rodemacher II, we will only have a few months of actual emissions data from which we can establish an expected emission rate, and the control device has not yet been permitted.
7. Enclosure 3 of the letter states: "...conduct and provide an analysis of emission control

alternatives for each BART-eligible source for SO2 and PM pollutants pursuant to the BART guidelines...” This seems to say that we leave NOX out of the five-factor analysis. However, further down the page, the letter states: “Emission limits for SCR retrofits should be assumed to minimally correspond to 98% control with a floor of 0.05 lbs/mmbtu...” This statement presumes that NOX is included in the five-factor analysis. Please clarify.

We appreciate your consideration of these issues and response. I can be reached at 318 484-7718.

Sincerely,

//s// Bill Matthews

Bill Matthews
Director – Environmental Policy and Planning

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